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August 11, 2025

VIA ECF

Honorable Julien Xavier Neals, U.S.D.J.
United States District Court
Martin Luther King Federal Building
50 Walnut Street
Newark, New Jersey 07102

Re: *In re: Apple Inc. Smartphone Antitrust Litigation*,
Civil Action No. 2:24-md-03113-JXN-LDW (MDL 3113)

Dear Judge Neals:

This firm, together with Gibson, Dunn & Crutcher LLP, represents Defendant Apple Inc. ("Apple") in the above-referenced multidistrict litigation ("MDL"). On July 30, 2025, Plaintiffs representing Direct iPhone Purchasers, Indirect iPhone Purchasers, and Direct Apple Watch Purchasers ("Plaintiffs") filed their consolidated class action complaints. *See* ECF Nos. 85–87. Apple intends to move to dismiss all three consolidated class action complaints pursuant to Federal Rule of Civil Procedure 12.

Subject to Your Honor's approval, the parties have conferred and agreed to the following:

1. On or before August 15, 2025, pursuant to Section IV.A of Your Honor's Rules and Procedures, Apple will file a single consolidated letter not to exceed six (6) single-spaced pages ("Apple's Pre-Motion Letter") requesting a pre-motion conference prior to moving to dismiss all three consolidated class action complaints;
2. On or before August 22, 2025, Plaintiffs will file a single consolidated letter, not to exceed six (6) single-spaced pages, responding to Apple's Pre-Motion Letter; and
3. The parties have been meeting and conferring and will continue to meet and confer regarding the schedule, structure, and page limits for Apple's anticipated motion(s) to dismiss, in preparation for submitting a proposal to the Court following the exchange of pre-motion letters and/or following a pre-motion conference.

If the above proposed schedule and procedure meets with Your Honor's approval, we respectfully request that Your Honor So Order this letter and enter it on the docket. Thank you for Your Honor's attention to this matter, and we are available should you have any questions.

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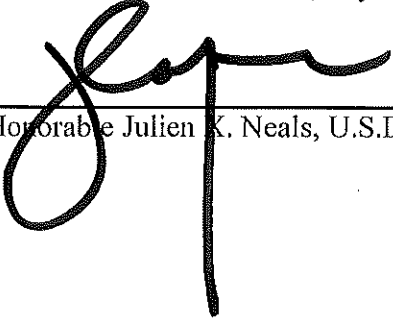
Respectfully submitted,

s/Liza M. Walsh

Liza M. Walsh

cc: All Counsel of Record (via ECF)

SO ORDERED this 12th, day of August, 2025



Honorable Julien K. Neals, U.S.D.J.